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RF-46469 (Rev. 11/93)

ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

April 5, 1994

EG&G ROCKY FLATS, INC.

94-RF-03974

Frazer R. Lockhart Acting Director Environmental Restoration Division DOE/RFO

DRAFT SUBMITTAL OF THE PROCESS FOR DETERMINING THE REMEDIATION CATEGORY OF INDIVIDUAL HAZARDOUS SUBSTANCE SITES (IHSS) FOR OPERABLE UNITS (OUs) 1 THROUGH 16 - SGS-226-94

Ref:

W. S. Busby ltr, WSB-009-94, to R. J. Schassburger, Submittal of the Evaluation of Individual Hazardous Substance Site for the Industrial Area Operable Units (8,9,10,12,13,14), January 19, 1994

EG&G Rocky Flats, Inc., is submitting the attached preliminary draft of the Process for Determining the Remediation Category of Individual Hazardous Substance Sites (IHSSs), Volume I and the IHSS Evaluation Forms, Volume II, both dated March 24, 1994. Both of these volumes are henceforth referred to as the "IHSS Evaluation." Volume I describes the process for evaluating IHSSs into three categories, 1) no further action, 2) potential early action, and 3) deferred to follow the normal RCRA [Resource Conservation and Recovery Act] Facilities Investigation/Remedial Investigation (RFI/RI) or to be linked to Transition/Decontamination and Decommissioning (T/D&D). Volume II contains the supporting documentation for the information presented and summarized in Volume I.

The IHSS Evaluation is the result of efforts from the Operable Unit (OU) managers and the ongoing efforts of the Environmental Restoration Management (ERM) Accelerated Cleanup Working Group. The purpose of the IHSS Evaluation is to provide a basis for categorization of IHSSs in order to identify the most appropriate remediation alternative for each IHSS and to allow for expedited cleanup of certain IHSSs. This IHSS Evaluation process supersedes previous categorization efforts, e.g. the detailed spreadsheet and narrative that listed all the IHSSs for the Industrial Area (IA) OUs as in the above referenced etter. Additionally, these evaluation documents are submitted to fulfill the requirements of the Quality Action Team issue number 21.

The process for the IHSS Evaluation was sent formally to the Department of Energy/Rocky Flats Office (DOE/RFO) on January 19, 1994 as referenced above. DOE/RFO sent the IHSS Evaluation process to the Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH) for review and comment on February 10, 1994. To date EG&G has not received any comments from either EPA nor CDH regarding the application of the process. The original IHSS Evaluation as referenced in the January 19, 1994, submittal was to be applied to the IA OUs (8,9,10,12,13,14). However, through the ERM Accelerated Cleanup Working Group the application of this process was found to be beneficial for all the OUs. Since the submittal of the process to DOE/RFO, EG&G has applied this evaluation process to all of the IHSSs for all the OUs, not just the IA OUs. EG&G believes that the results of this effort should be communicated to both EPA and CDH in a working meeting forum with DOE/RFO and EG&G. EG&G proposes that DOE/RFO review the IHSS Evaluation, documents and involve both EPA and CDH early on in the review process.

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One complete copy of this IHSS Evaluation, Volumes I and II were hand delivered to Steve Slaten of DOE/RFO on April 4, 1994. EG&G can provide additional copies as necessary.

If you have any questions or require additional information regarding this matter, please contact B. D. Peterman at extension 8659 of Remediation Project Management.

W. S. Bus

Director

ERM/Remediation Project Management

EG&G Rocky Flats, Inc.

BDP:tjr

Orig. and 1 cc - F. R. Lockhart

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M. H. McBride - DOE/RFO

J. M Roberson - " "

M. N. Silverman – " " S. Slaten – "

L. W. Smith - " "